

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

DANA ALBRECHT,  
Plaintiff

Civil Action No. 1:25-CV-00093

v.

JUDGE JOHN PENDLETON, solely in his  
official capacity as a Judge of the New  
Hampshire Circuit Court;

REFEREE SCOTT MURRAY, solely in his  
official capacity as a referee pursuant to  
N.H. Rev. Stat. § 490-F:15 for the State of  
New Hampshire;

JUDGE ELLEN CHRISTO, solely in her  
official capacity as the Administrative  
Judge of the New Hampshire Circuit Court,  
and her successor(s) in office;

CHIEF JUSTICE GORDON MACDONALD,  
JUSTICE JAMES P. BASSETT, JUSTICE  
ANNA BARBARA HANZ MARCONI,  
JUSTICE PATRICK E. DONOVAN,  
JUSTICE MELISSA COUNTWAY, solely  
in their official capacities as justices of the  
New Hampshire Supreme Court, and their  
successor(s) in office;

ERIN CREEGAN, solely in her official  
capacity as General Counsel of the New  
Hampshire Judicial Branch, and her  
successor(s) in office,

TRACY MEYER, solely in her official  
capacity as the Clerk of the 10<sup>th</sup> Circuit  
District Court, Hampton, New Hampshire,  
and her successor(s) in office;

**(continued on next page)**

THE 24 MEMBERS OF THE  
NEW HAMPSHIRE JUDICIAL  
COUNCIL,  
solely in their official capacities as  
members of the council, and their  
successor(s) in office;

CHARLES M. ARLINGHAUS, solely in  
his official capacity as Commissioner at the  
New Hampshire Department of  
Administrative Services, and his  
successors(s) in office;

THE NEW HAMPSHIRE PUBLIC  
DEFENDER; a 501(c)(3) corporation;

JOHN FORMELLA, solely in his official  
capacity as Attorney General of the State  
of New Hampshire, and his successor(s) in  
office;

JOHN VENTURA, solely in his official  
capacity as Police Prosecutor for the Town  
of Seabrook, New Hampshire, and his  
successor(s) in office;

DANIEL LAWRENCE, solely in his  
official  
capacity as Sergeant for the Seabrook  
Police Department, and his successor(s)  
in office;

KASSANDRA STORMS a/k/a  
KASSANDRA KAMINSKI, solely in her  
official capacity as a patrol officer for the  
Seabrook Police Department, and her  
successor(s) in office;

THE TOWN OF SEABROOK, a municipal  
corporation in New Hampshire;

**(continued on next page)**

THOMAS W. FOWLER, solely in his official capacity as Chief of Police for the Town of Salisbury, Massachusetts, and his successor(s) in office;

ANTHONY KING, solely in his official capacity as former Lieutenant of the Police Department for the Town of Salisbury, Massachusetts, and his successor(s) in office;

PATRICK SZYMKOWSKI, solely in his official capacity as a patrol officer of the Police Department for the Town of Salisbury, Massachusetts, and his successor(s) in office;

THE TOWN OF SALISBURY, a municipal corporation in Massachusetts,

Defendants

***ASSENTED-TO MOTION TO ADMIT JOSEPH A. PADOLSKY  
AS COUNSEL PRO HAC VICE***

NOW COMES Liam Scully, Esquire, local counsel for the Defendants, Town of Salisbury, Thomas W. Fowler, Patrick Szymkowski and Anthony King and respectfully moves for admission of Joseph A. Padolsky, Esquire, as counsel *pro hac vice*. In support of this motion, local counsel states as follows:

1. Liam Scully, Esquire, of the Law Office of Scully & Lagos, is local counsel for the Defendants, Town of Salisbury, Thomas W. Fowler, Patrick Szymkowski and Anthony King.
2. Pursuant to Local Rule 83.2(b), undersigned local counsel hereby moves this Honorable Court to admit Joseph A. Padolsky, Esquire, *pro hac vice*, as lead co-counsel in this case.

3. Attorney Padolsky is a member in good standing of the Bar of the Commonwealth of Massachusetts and his law office is located at Ten Post Office Square, Suite 1330, Boston, MA 02109.
4. Local counsel will remain associated with Attorney Padolsky during the pendency of this action with the intent that all process, notices and other papers shall be served upon local counsel. Local counsel will execute all filings submitted to the Court and will attend proceedings unless excused by the Court.
5. With this Motion, Attorney Padolsky has submitted an Affidavit in support of his admission *pro hac vice*, which he satisfies all of the requirements of Local Rule 83.2(b)(1). *See Attachment "A"- Affidavit of Attorney Joseph A. Padolsky*. Additionally, a \$100.00 fee for admission is being submitted contemporaneously with the filing of this Motion.
6. Plaintiff assents to this Motion.
7. For the foregoing reasons, the Defendants respectfully request that this Court enter an Order, pursuant to Local Rule 83.2(b), permitting Attorney Padolsky to appear *pro hac vice* in this matter.

WHEREFORE, local counsel for the Defendants, Town of Salisbury, Thomas W. Fowler, Patrick Szymkowski and Anthony King, respectfully requests that this Court:

- A. Admit Joseph A. Padolsky, Esquire, as counsel *pro hac vice*; and
- B. Grant such further relief as justice may require.

Respectfully submitted,  
Town of Salisbury, Thomas W. Fowler,  
Patrick Szymkowski and Anthony King,

By their attorney,

/s/Liam Scully  
Liam D. Scully  
Scully & Lagos  
Ten Post Office Square  
Suite 1330  
Boston, MA 02109  
(617) 307-5056  
N.H. Bar No. 16875

Dated: April 16, 2025

**Statement of Concurrence**

I, Liam Scully, hereby certify that pursuant to LR 7.1(c), I have made a good faith attempt to obtain concurrence in the relief sought herein and the plaintiff assented.

/s/Liam Scully  
Liam D. Scully

**Certificate of Service**

I, Liam Scully, hereby certify that on this date a copy of the foregoing filing was forwarded to counsel of record, via ECF.

/s/Liam Scully  
Liam D. Scully

Dated: April 16, 2025